		U.S. DISTRI DISTRICT OF FILE	VERMONT
UNITED STATE	ES DISTRICT COURT		_ U
	OR THE	2024 MAR 2 I	PM 2:31
DISTRIC	OF VERMONT	CLE	RK
UNITED STATES OF AMERICA	)	RY Al	
	)	DEPUTY	CLERK
v.	) Case No.	2:24-Cr	-32-1
LUIS FERNANDO BARRAGAN-PALACIO	os, )		
Defendant.	)		

## **INDICTMENT**

The Grand Jury charges:

## Count One

Beginning on a date unknown to the Grand Jury, but at least as early as August 15, 2023, and continuing until at least January 4, 2024, in the District of Vermont and elsewhere, defendant LUIS FERNANDO BARRAGAN-PALACIOS knowingly and intentionally agreed and conspired with other individuals known and unknown to the grand jury to transport and move individuals—whom the defendant knew to be, or recklessly disregarded were, aliens who had come to and entered the United States in violation of law—within the United States by means of transportation or otherwise in furtherance of the aliens' illegal entry.

(8 U.S.C. §§ 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i))

## Count Two

On or about January 4, 2024, in the District of Vermont, defendant LUIS FERNANDO BARRAGAN-PALACIOS, knowing and in reckless disregard of the fact that certain aliens—including K.O.M.-R. —had come to, entered, and remained in the United States in violation of law, transported and moved and attempted to transport and move A.D, K.M., C.G., D.D., M.E. and K.O.M.-R. within the United States in furtherance of their violation of law.

(8 U.S.C. § 1324(a)(1)(A)(ii))

TRUE BILL

FOREPERSON

NIKOLAS P. KEREST (MJL)

United States Attorney Burlington, Vermont

March 21, 2024